IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF PUERTO RICO

IN RE		
	*	CASE NO. 13-00811 BKT
ROSALY MARIS PEREZ ORTIZ	*	
	*	CHAPTER 13
DEBTOR	*	

DEBTOR'S MOTION REQUESTING ORDER RE: AUTHORIZATION TO USE FUNDS FROM 2012TAX REFUND

TO THE HONORABLE COURT:

NOW COMES, ROSALY MARIS PEREZ ORTIZ, debtor, through the undersigned attorney, and very respectfully states and prays as follows:

- 1. The debtor's confirmed Plan dated March 11, 2013, provides that debtor's tax refunds will be paid into the Plan. See docket no. 13
- 2. The debtor received her 2012 tax refund in the sum of \$576.00. Attached is copy of the bank account statement which reflects the "direct deposit" or electronic transfer of funds received from the Treasury Department of Puerto Rico on May 28, 2013.
- 3. The debtor respectfully submits to the Court that she needs to use these funds to pay for: new car tires and car repairs. Attached is copy of tire shop estimate/invoice.
- 4. The debtor needs to use the funds from the 2012 "tax refund' to pay for this reasonable expense The debtor is living within a very "tight" budget which barely covers her daily expenses and a Plan payment of \$175.00, which Plan payments are up-to-date with the Trustee.
- 5. Based on the abovestated, the debtor respectfully requests this Court to Order the authorization of the use of these funds to allow the debtor to pay for this expense with her 2012 "tax refund".

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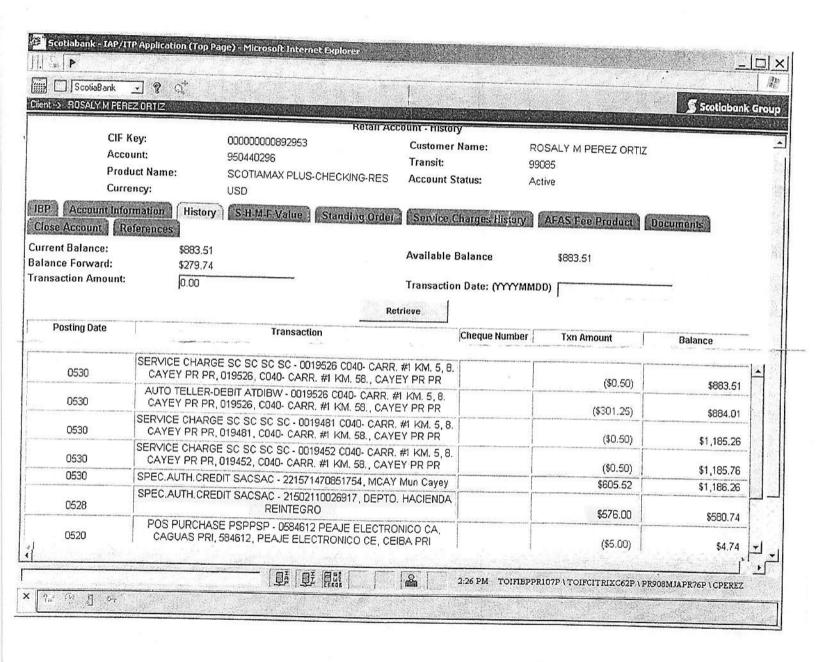
WHEREFORE, debtor, through the undersigned attorney respectfully requests that this Honorable Court grant the foregoing motion and allow the use of the funds from the 2012 tax refund by the debtor, to pay for the above stated expense.

NOTICE: Within fourteen (14) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006 (f) if you were served by mail, any party against whom this paper has been served, or any other party to the action that objects to the relief sought herein shall serve and file an objection or other appropriate response to this paper with the Clerk's office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (i) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the Court, the interest of justice requires otherwise.

I CERTIFY that on this same date a copy of this motion was filed with the Clerk of the Court using the CM/ECF system which will send notice of same to the Chapter 13 Trustee, Alejandro Oliveras Rivera, Esq.; I also certify that a copy of this motion was sent via US Mail to Rosaly M Perez Ortiz, 104 Jose De Diego Cayey PR 00736.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 18th day of June, 2013.

/s/ Roberto Figueroa Carrasquillo ROBERTO FIGUEROA CARRASQUILLO USDC #203614 ATTORNEY FOR PETITIONER PO BOX 186 CAGUAS PR 00726 TEL NO 787-744-7699 FAX 787-746-5294 Email: rfigueroa@rfclawpr.com



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INVOICE

Phone 787-955-2984

Fernando Blas

lic # Ma-16746

DATE: JUNE 8, 2013

Rosalí m Pérez Ortiz

SUZUKI AEREO 2006

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	MATERIALES	TRABAJO	
	\$144	\$50	
	\$58	\$45	
		¢4E	
		\$356.00	
	10		
			\$698.0
_			\$58 \$45 \$45